

**FILED**

**AUG 21 2015**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TERRENCE STARKS,

Defendant.

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) CRIMINAL NUMBER: 15-30130-NJR  
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)

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**Wire Fraud**

1. From in or about October, 2014 and continuing through February, 2015, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

**TERRENCE STARKS,**

defendant herein, did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations.

2. **TERRENCE STARKS** at all times relevant to this indictment worked for the U.S. Department of Veteran's Affairs. The U.S. Department of Veteran's Affairs provides federal benefits to veterans that include military service connected disability payments and provides benefits to dependents and survivors of veterans that include burial and memorial benefits and dependent and survivor benefits. Among his duties and responsibilities, **TERRENCE STARKS** received telephone calls notifying the U.S. Department of Veteran's Affairs when a veteran or another person receiving benefits had died or otherwise needed to change the benefits account information. In his employment with the U.S. Department of

Veteran's Affairs, **TERRENCE STARKS** was in a position of trust and had access to the personal identifier information of veterans and dependents and surviving spouses of veterans.

3. As part of the scheme to defraud, **TERRENCE STARKS** would and did access the U.S. Department of Veteran's Affairs computerized software system for the payment and distribution of benefits. That database contained the names, Social Security numbers, dates of birth, and bank account information, among other information. **TERRENCE STARKS** did fraudulently, unlawfully, and without authority change the routing number and account number of a veteran recipient's benefits to an account controlled by **TERRENCE STARKS** through his girlfriend, thereby misrepresenting to the U.S. Department of Veteran's Affairs that the veteran or survivor was still receiving the benefits.

4. In furtherance of the scheme to defraud, **TERRENCE STARKS** caused the foreseeable use of an interstate wire communication in October of 2014, by causing a transfer of veteran's benefits purportedly for "E.M." to a checking account at 1st Mid America Credit Union in Bethalto, Illinois that was controlled by **TERRENCE STARKS**.

All in violation of Title 18, United States Code, Section 1343.

## **COUNT 2**

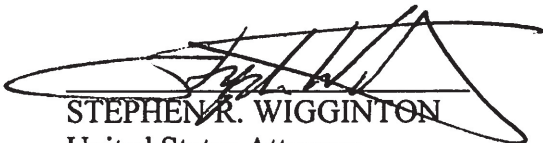
### **AGGRAVATED IDENTITY THEFT**

From on or about November 3, 2014 and continuing through December 31, 2014, in Madison County, Illinois, within the Southern District of Illinois and in the Eastern District of Missouri,


**TERRENCE STARKS**,  
defendant herein, did knowingly use without lawful authority a means of identification of another person, knowing that the means of identification belonged to another person, during and in relation to the felony offense of Wire Fraud through the use of a means of identification of

another person, "W.D." "W.D." is a veteran who has 80% service connected disabilities that include dementia due to head trauma and spinal issues. On November 3, 2014, **TERRENCE STARKS** accessed the U.S. Department of Veteran's Affairs computerized software system for the payment and distribution of benefits and changed the bank account information to a checking account at 1st Mid America Credit Union in Bethalto, Illinois, that was controlled by **TERRENCE STARKS**.

All in violation of Title 18, United States Code, Section 1028A.



STEPHEN R. WIGGINTON  
United States Attorney  
Southern District of Illinois



NORMAN R. SMITH  
Assistant United States Attorney

Recommended bond: Detention